

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Part 95 of the ) WT Docket 95-102  
Commission's Rule to )  
Establish a Very Short Distance )  
Two-Way Voice Radio Service )

Comments to a Notice of Proposed Rule Making

Filed by:

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Date: September 22, 1995

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QUALIFICATIONS

I am a licensed GMRS user and have been since 1985 and a control operator for the local REACT Team's GMRS repeater on 462.675 mhz., the Emergency and Motorist's Assistance channel. I am also a licensed Amateur Radio Operator (WL7DZ).

My GMRS radio system is used for personal business and I use one as well in conjunction with the aforementioned REACT group for inter-team communications and contact with the general public when they need help.

PURPOSE OF FILING

I am writing to voice my objection over the proposed establishing of the "Family Radio Service" on current GMRS channels and channel pairs, based on the following below.

KNOWN FACTS

May I point out that the short range to which you refer is affected more by antenna height in UHF than is radio power.

Further, per a 1988 Commission ruling, GMRS is already a family radio service. Delicensing will no longer regulate who can and cannot subscribe to GMRS. The only ones to benefit from proposed delicensing will be the radio manufacturers, not the public. You exist to protect and to serve the communicating public first and foremost.

It was also in 1988, that the Commission found that the manufacturer's sales promotions geared towards commercial-use markets was incompatible with personal and family uses.....

The proposed interstitial frequencies are located in between many, nationally established **RECEIVING** channels. Proposals state they are in between transmitting channels. They are not. This threatens repeaters on 467 mhz.

Lastly, it was the FCC's own ruling and I quote from the FCC Report and Order, PR Docket 87-265 at par.16: "We seek to discourage the proliferation of what are typically part 90 (business and commercial) users of the GMRS. The GMRS is not and should not become the "other" Business Radio Service.

### COMPLAINTS

I object to the proposed mixing of licensed and unlicensed GMRS operators. Previous investigations by the FCC found such mixing to be unbearable and insupportable.

It has happened recently and in past years that I have had to put up with a myriad of interferences from other users who refuse to use callsigns and even a local television station which, after a complaint to our now closed monitoring station, was issued a letter to repair the problem that plagued and threatened the continuity of our repeater.

As with certain types of services where restrictions apply for joint-use, it would appear the FCC has no regard for the importance of current user's communications needs by proposing to allow any "Tom, Dick and Harry" to join in.

Being a CB Emergency Channel 9 REACT Monitor, I get frustrated listening to foul language, rude operators and suffering the agony of illegally powered stations disrupting not only Channel 9, but all 40 channels.

### PROPOSALS AND SUGGESTIONS

FRS should be secondary to true GMRS in order to protect GMRS from the obvious potential interference. It is one of the FCC's purposes to protect legally licensed radio systems from just such a threat. You would be creating your own violation.

Could you not locate FRS in the unlicensed "Part 15" band? That would seem to me to be a logical place. It will make little difference to radio manufacturers what chip they install into future radios.

As it also frequently happens that other users fail to monitor the "shared" channel before they use it, another incorporation would be a muting defeat so that the transmitter was disabled until the receiver muting also had been disabled.

Further, as I have had to listen to long-winded background conversations and music radios when hand-held units or microphones were sat upon, I recommend that any FRS radios be equipped with a "time-out" feature in the event the transmitter is inadvertently or intentionally keyed.

The plague of interference from other users of GMRS for both my personal use and use in REACT prompts me to ask also if the rules could be written so that it would be a manufacturing requirement for FRS equipment to employ an AUTOMATIC TRANSMITTER IDENTIFIER (ATIS)?

In the NPRM proposal, there is a claim that a number of factors will limit the interference potential of FRS units. This is without basis. 12.5 khz separation from primary GMRS channels will be entirely insufficient because the innovation employed has an emission envelope of 18 to 20 khz.

I further demand that the FCC listen to suggestions and complaints from the thousands in the GMRS community. Who better to offer ideas for improvements to equipment and licensing procedures?

Our pleas to help us help the public are answered by replies such as, "We are too busy for CB." or "We don't have enough personnel at this time." Too busy to chase down an un-licensed operator? Is this the way it will be with GMRS????

Will we ever see a time when CB service is cleaned up? And now, with no local monitoring station and a lack of enforcement agents, the only hope we as GMRS users have is the non-creation of the problem before it starts. This can only be done by the FCC listening to us and applying some forethought to the ins and outs of FRS and the proposed consequences on GMRS.

I ask you to leave GMRS alone. There is nothing wrong with it and you are not improving it. I have nowhere else to go for quality and disciplined communications. There is nothing to prompt FRS users to choose an alternative channel and would not even be aware that they were creating a problem.

If the public outcry is for a cheap, low power, unlicensed radio service, let them buy CB (27 mhz) radios and put up with what we current GMRS users will have to should you proceed with your current proposal.